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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ELIZABETH GARRIDO, individually and on  
behalf of all those similarly situated,

Plaintiff,

v.

FARMERS AUTOMOBILE INSURANCE  
ASSOCIATION, FARMERS INSURANCE  
EXCHANGE, DOES 1 through 10;

Defendants.

Case No.: 2:21-cv-00440-JCM-BNW

**STIPULATION AND PROPOSED ORDER  
REGARDING WAIVER OF SERVICE,  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT, AND STAY OF  
DISCOVERY**

Plaintiff Elizabeth Garrido (“Plaintiff”) and Defendant Farmers Insurance Exchange (“FIE”) (collectively the “Parties”), by and through their respective counsel of record, agree as follows:

1. Plaintiff filed its complaint in the Eighth Judicial District Court of Clark County, Nevada, in the action styled *Garrido v. Farmers Automobile Insurance Association, et al.*, Case No. A-21-829905-C (the “Complaint”).

2. FIE removed this action to this Court on March 17, 2021.

3. Counsel for the Parties held a telephonic meet and confer on March 31, 2021 to discuss service of the Complaint, FIE’s anticipated response date, and discovery issues.

4. Pursuant to Fed. R. Civ. P. 4(d), FIE hereby waives service, by and through its counsel, of the Complaint and Summons. This waiver shall not operate to waive, release, compromise, or prejudice any rights, defenses, objections, arguments, or claims FIE may have to the lawsuit.

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5. FIE shall answer or otherwise respond to the Complaint in this action by or before May 14, 2021.

6. If FIE files a motion to dismiss or other motion, Plaintiff's opposition thereto shall be due on or before June 14, 2021.

7. FIE's reply in support of the motion shall be due on or before July 9, 2021.

8. Pending resolution of FIE's forthcoming motion, the Parties agree and stipulate to a stay of discovery including, but not limited to, any discovery obligations set forth in Fed. R. Civ. P. 26 and LR 26-1, in order to preserve judicial and party resources.

9. If the Court denies FIE's forthcoming motion, in whole or in part, the Parties agree to submit a Discovery Plan and Scheduling Order within thirty (30) days after entry of the Court's order on the motion.

10. The Parties respectfully suggest that good cause exists to enter the above-noted briefing schedule and enter the Parties' stipulated stay of discovery.

11. The Parties represent that this stipulation is sought in good faith, is not interposed for delay, and is not filed for an improper purpose.

DATED this 9th day of April, 2021.

DATED this 9th day of April, 2021.

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MATTHEW L. SHARP, LTD.

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IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 15, 2021

CASE NO.: 2:21-cv-00440-JCM-BNW